

FEDERAL DEFENDER SERVICES
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March 24, 2022

Honorable James D. Peterson
United States Chief District Court Judge
120 North Henry Street
Madison, Wisconsin 53703

Re: *United States v. Daniel Peggs*
Case No. 20-cr-20-jdp

Dear Judge Peterson:

The defense respectfully moves for an eight-day extension of time to file a response to the government's motion for restitution. Given that Ms. Pfluger has left for a detail, I have not conferred with her or anyone in the U.S. Attorney's office about this request.

Last time the defense moved for time, we had not spoken to Mr. Peggs about his position on the government's request. Since then we have sent the government's brief and a letter asking that his counselor arrange a time for us to speak. That is normally the most efficient way to set up prison calls. Unfortunately, we have not received any response from the counselor or Mr. Peggs. His family has, however, communicated with our office and told us that he's being moved around and has not been assigned a counselor. Before filing a response, I would like to confer with Mr. Peggs.

In addition, while I have research and an outline of the response, I have not finished the brief. Supervisory matters last week occupied most of my week, and I also had a Seventh Circuit brief due last Thursday and oral argument next week in the Seventh Circuit. In a word, I have been crushed by work.

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Thus, for those two reasons, I would ask the court for an additional eight days to file the response brief.

Thank you for your attention to this matter.

Sincerely,

/s/ Joseph A. Bugni

Joseph A. Bugni
Associate Federal Defender